

CONFIDENTIAL JURY QUESTIONNAIRE

Instructions:

Those of you who serve on the jury in this case will decide questions of fact. In order to ensure that each of you can do so fairly and according to the law, we engage in a process known as voir dire. This is a phrase that means “to speak the truth.” Lawyers from both sides will consider your answers. We rely on your truthfulness to ensure a fair trial.

You are requested to give true and complete answers to all questions. The purpose of the questions on the following pages is not to ask unnecessarily about personal matters, but solely to provide information about you, as a potential juror, to help the attorneys select a jury.

Where indicated, please check the space for “Yes” or “No,” and, as requested, furnish answers, explanations or details in the space provided. Please print or write your answers clearly in blue or black ink. Please do not leave any question unanswered. If you do not understand any question or do not know the answer, please write, “I do not understand,” or “I do not know,” in the space provided for the answer. If there is not enough space for you to write out an answer, please continue your answer in the margin next to the question. Do not write on the back of any page. If you believe that any of the questions do not apply to you, please write “N/A” in the space provided.

When you come back to court, the judge and the attorneys may ask specific questions about some of the information in your questionnaire. If there are things you do not want to talk about in open court, please circle the question numbers and list them at the end of the questionnaire in the space provided for this purpose. Arrangements will be made to question you privately about these matters.

Do not discuss the questions or answers with any other person or with fellow jurors. It is very important that your answers be your own individual answers.

Please answer the questions below honestly and completely. Your answers will be used only by the Court and the attorneys in this case to select a jury and for no other reason. The confidentiality of your answers will be strictly maintained.

Juror Name: _____
Juror Number: _____

The Case:

United States of America v. John Louis Blalack, Sarah Adelia Graves, Shelbie Brooke Richards and Robert Henry Rice

The criminal case about to be tried is the result of charges brought against four separate people by a grand jury sitting in the Southern District of Mississippi. The charges that have been filed are not evidence. All of the persons charged are presumed innocent until proven guilty beyond a reasonable doubt at trial.

This case involves allegations by the United States Government that John Louis Blalack, Sarah Adelia Graves, Robert Henry Rice and Shelbie Brooke Richards committed various crimes in the Southern District of Mississippi in the late Spring and early Summer of 2011. All the defendants are alleged to have participated in a conspiracy to violate the civil rights of African American citizens located in Jackson, Mississippi. Each of the defendants is alleged to have participated in or committed one or more crimes of violence against African American people in Jackson. Two of the defendants are alleged to have violated federal weapons laws in association with their crimes. Two of the defendants are alleged to have solicited others to commit crimes of violence against African Americans in Jackson. One defendant is alleged to have made false statements to the FBI in connection with these crimes.

All of the people charged have pleaded not guilty to all charges and have exercised their right to trial by jury.

Juror Name: _____
Juror Number: _____

1. The Court and the parties estimate that after a jury is selected this case may last as long as four weeks. Jury service is one of the highest duties and privileges of a citizen of the United States. Mere inconvenience or the usual financial hardships of jury service will be insufficient to excuse a prospective juror. Do you wish to apply to the court to be excused on the ground that jury service would be a serious hardship?

YES ____ NO ____

If yes, briefly explain the hardship.

**WHETHER OR NOT YOU ARE CLAIMING A HARSHIP, PLEASE COMPLETE
THE REST OF THE
QUESTIONNAIRE.**

2. Do you have any difficulty reading, speaking or understanding English?

YES ____ NO ____

3. Do you have any physical problem (for example, with your sight or hearing) that would interfere with your ability to serve?

YES ____ NO ____

If your answer is YES, please describe:

4. Are you regularly taking any medication that could affect your ability to serve?

YES ____ NO ____

If you answered YES, please describe:

5. Do you suffer from any emotional or mental health problems?

Juror Name: _____
Juror Number: _____

YES _____ NO _____

If you answered YES, please describe:

6. Do you hold any religious beliefs that may interfere with your jury service?

YES _____ NO _____

If you answered YES, please describe:

7. (a) What is your age? _____

(b) Are you: Male _____ Female _____

8. What is your place of birth? If outside the United States, please list the country.

9. What is your ethnic background? (Check all that apply)

White/Caucasian, not Hispanic
 Black/African American, not Hispanic
 Hispanic/Latino
 Asian or South Asian
 American Indian or Native American
 Other, please specify: _____

10. Are you:

Married, domestic partnership or common law marriage
 Single, never married
 Divorced/separated
 Widow/widower

11. Do you have any children?

YES _____ NO _____

If yes, please fill out the chart below:

Age	Sex	Education	Type of Employment
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Juror Name: _____
Juror Number: _____

12. (a) What is your city or county of residence?

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(b) How long have you lived at your present residence? _____ Years _____ Months

13. Do you:

_____ Own your own home?

Rent?

Neither own nor rent, but live with family/friends.

14. Are you: (Check any and all that apply)

Self-employed?

Employed full-time?

_____ Employed part-time?

Working in the home?

Unemployed/laid off?

_____ Retired?

_____ Student?

Disabled and unable to work?

15. (a) If you are employed, what type of work do you do? (If retired or unemployed, what type of work did you last perform?)

(b) Do you (or did you) supervise employees in your work?

YES _____ NO _____

If yes, how many? _____

(c) What is your spouse/domestic partner's occupational status? (check all that apply)

Work full time outside of the home

Juror Name: _____
Juror Number: _____

Work part time outside of the home
 Full time homemaker
 Homemaker with part time employment
 Unemployed
 Student
 Retired
 Disabled
 Other

(d) If your spouse/domestic partner is employed, please describe what kind of work he/she does.

16. (a) Have you ever served in the military?

YES _____ NO _____

(b) If yes, when? _____

(c) In what branch? _____

(d) What was your highest rank? _____

(e) Any combat duty? YES _____ NO _____

(f) Did you ever participate in any capacity in a court martial? YES _____ NO _____

17. (a) Please check the highest level of education for you and your spouse/domestic partner.

	You	Spouse/Partner
Grade school or less	_____	_____
Some high school	_____	_____
High school graduate	_____	_____
Technical or business school	_____	_____
Some college	_____	_____
College degree	_____	_____
Graduate work or degree	_____	_____

(b) If you are presently a student, please describe briefly your area of study.

(c) Name any degrees you have earned and your major areas of study.

(d) Even if you have never earned a law degree, please describe any law related courses you have had (for example, business law courses in college, paralegal programs).

Juror Name: _____
Juror Number: _____

18. Would you say that you seek out positions of leadership when you participate with others in your employment or other activities?

Always
 Often
 Sometimes
 Seldom
 Never

19. Regarding media consumption, please answer the following questions.

(a) How often do you read the newspaper?

Every day
 Several times a week
 Once or twice a week
 Less often then once a week
 Never

(b) How often do you watch the news on television?

Every day
 Several times a week
 Once or twice a week
 Less often then once a week
 Never

(c) How often do you listen to the radio news broadcasts?

Every day
 Several times a week
 Once or twice a week
 Less often then once a week
 Never

(d) How often do you get news off of the internet?

Every day
 Several times a week
 Once or twice a week
 Less often then once a week
 Never

Juror Name: _____
Juror Number: _____

20. Please list all sources of news you watch, listen to, or read on a regular basis, in print or on television, radio or the internet. Please include the names of any particular news programs or internet sites you frequent. Also, include your source of radio talk shows.

21. Do you ever listen to radio talk shows, turn to political commentators on TV or the radio, or do you ever visit political blog sites on the internet?

YES _____ NO _____

If yes, which ones do you visit?

22. Have you read any of the following books or seen any of the following movies:

a. <u>The Turner Diaries</u> by William L. Pierce	1. Yes	2. No
b. <u>The Kloran</u> by the Ku Klux Klan	1. Yes	2. No
c. <u>My Undercover Years with the Ku Klux Klan</u> by Gary Rowe	1. Yes	2. No
d. <u>The Freedom Summer Murders</u> by Don Mitchell	1. Yes	2. No
e. <u>Never Too Late</u> by Bobby Delaughter	1. Yes	2. No
f. <u>The Invisible Empire: The Ku Klux Klan</u> by Anthony S. Karen	1. Yes	2. No
g. <u>Klanville USA</u> by David Cunningham	1. Yes	2. No
h. <u>Mississippi Bridge</u> by Mildred D. Taylor	1. Yes	2. No
i. <u>Ghosts of Mississippi</u> (1996 movie)	1. Yes	2. No
j. <u>Mississippi Burning</u> (1988 movie)	1. Yes	2. No
k. <u>Four Little Girls</u> (1997 historical documentary)	1. Yes	2. No

If you answered yes to any of these, what did you think about what you read or saw?

23. What criminal cases, if any, have you followed on television, in the newspaper, or in other media?

What about the case interested you?

Juror Name: _____
Juror Number: _____

24. If you are chosen to be a juror, you will not be permitted to read or listen to any media or internet coverage of this case and related subjects. Would these restrictions pose any difficulty for you?

YES _____ NO _____

If so, please state your reasons:

25. Please list organizations to which you or your spouse/domestic partner belong to, or in which, either of you participate, either now or in the past five (5) years. Please include any civic, social, religious, charitable, volunteer, political, sporting, professional, business, union, fraternal, and recreational groups.

Self:

Spouse/Domestic partner:

If you have listed an organization in your answer to question no. 20, have you ever held any office or title in any of the organizations you or your spouse/domestic partner have listed?

YES _____ NO _____

26. To what groups or organizations, if any, did you donate money, goods or volunteer time during the past five (5) years?

27. Have you or any member of your family, or close personal friend, ever held an elected or appointed office in any federal, state or local government?

YES _____ NO _____

Juror Name: _____
Juror Number: _____

If yes, please describe:

28. Do you have any relatives or close friends who are lawyers or who have attended law school?

YES _____ NO _____

If yes, please describe your relationship with the person and, if you know, the type of law he or she practices (e.g., uncle -- real estate law; neighbor -- criminal law), please list that also.

29. Have you, or any family member or close friend, ever worked for or with a criminal defense lawyer or private investigator?

YES _____ NO _____

30. (a) Have you, or any family member or close friend, ever applied to work or actually worked in any area of law enforcement? (e.g., any prosecutor's office, whether federal or state; any federal investigative agency, such as the FBI, Drug Enforcement Administration, Department of Homeland Security, Transportation Safety Administration, Bureau of Alcohol, Tobacco, Firearms and Explosives, Postal Inspectors; any state or local police department; any probation office; any correctional facilities).

YES _____ NO _____

(b) Are you planning, or (if you know) is anyone in your family or close circle of friends planning to apply for a law enforcement position?

YES _____ NO _____

If yes to either of the above, please describe. If the person is someone other than yourself, you need not identify by name, but simply by relationship to you (e.g., father - police detective; friend - applied to be corrections officer).

Juror Name: _____
Juror Number: _____

31. Have you, or any family member, been a member of any group that lobbies or takes public positions on political issues?

YES _____ NO _____

If yes, please describe.

32. Have you ever sued anyone or been sued by anyone?

YES _____ NO _____

33. Have you, or any family member or close friend, ever been charged with a crime or been the subject of a criminal investigation?

YES _____ NO _____

34. Have you, or any family member or close friend, ever appeared or testified as a witness in any investigation or legal proceeding?

YES _____ NO _____

35. Have you, or any family member or close friend, ever been questioned in any matter by any local, state or federal law enforcement agency?

YES _____ NO _____

36. Have you ever had a dispute with any local, state or federal agency or any of its employees?

YES _____ NO _____

37. Have you, or any family member or close friend, ever been the victim of a crime (whether or not reported to the police)?

YES _____ NO _____

If yes, did you report it?

YES _____ NO _____

Juror Name: _____
Juror Number: _____

If yes, how did you feel about how the matter was handled?

If no, why did you choose not to report?

38. (a) Have you ever served as

A juror in a civil case?

YES _____ NO _____

A grand juror?

YES _____ NO _____

A juror in a criminal case?

YES _____ NO _____

If you have sat as a juror in a *criminal* case, please fill out the following chart:

Date	State or Federal	Type of Case	Jury Verdict, (if there was one)
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

(b) If you sat as a juror in a criminal case, were you ever the jury foreperson?

YES _____ NO _____

(c) If you have had any experience as a juror, did you find it to be a positive one?

YES _____ NO _____

If no, please explain:

Juror Name: _____
Juror Number: _____

39. This case is being prosecuted by the United States Attorney's Office for the Southern District of Mississippi and the Civil Rights Division of the United States Department of Justice. Do you know, or have you ever heard of, any of the following people associated with these offices?

Glenda Haynes

YES _____ NO _____

Sheldon Beer

YES _____ NO _____

Paige Fitzgerald

YES _____ NO _____

If yes to either, please explain the circumstances.

40. If you know other attorneys or employees of the United States Attorney's Office for the Southern District of Mississippi, please list them below and indicate how you know them.

41. The defendants in this case are John Louis Blalack, Sarah Adelia Graves, Robert Henry Rice and Shelbie Brooke Richards.

(a) Do you know, or think you have ever heard of any of the defendants or anyone related to them?

YES _____ NO _____

If yes, please explain the circumstances.

42. Do you know, or have you ever heard of, any of the following attorneys who will be representing John Louis Blalack in this case?

Robert (Bob) Waller, Jr.

Juror Name: _____
Juror Number: _____

YES _____ NO _____

If yes to any, please explain the circumstances.

43. Do you know, or have you ever heard of, any of the following attorneys who will be representing Sarah Adelia Graves in this case?

Thomas Fortner

YES _____ NO _____

If yes to any, please explain the circumstances.

44. Do you know, or have you ever heard of, any of the following attorneys who will be representing Shelbie Brooke Richards in this case?

Merrida (Buddy) Coxwell

YES _____ NO _____

Charles (Chuck) Mullins

YES _____ NO _____

If yes to any, please explain the circumstances.

45. Do you know, or have you ever heard of, any of the following attorneys who will be representing Robert Henry Rice in this case?

Lawrence Coco

YES _____ NO _____

If yes to any, please explain the circumstances.

Juror Name: _____
 Juror Number: _____

46. Reports about this case have, from time to time, appeared in the press. Have you seen, heard or read anything about this case? (This includes, not only anything you may have seen or read in the media, but also anything you might have heard from relatives, friends or coworkers.)

YES _____ NO _____

47. Will the fact that this case involves allegations that African American citizens were targeted because of their race affect your ability to serve fairly and impartially?

YES _____ NO _____

48. If you are selected as a juror in this case, you may be required to read or listen to racially offensive language, including the word “nigger”. This evidence will be relevant to the case presented by the Government. Will reading or listening to such language affect your ability to consider this case objectively and to follow the instructions of the court?

YES _____ NO _____

49. Please indicate how much you disagree or agree with each statement by circling a number on the scale. There are no right or wrong answers, only your opinions.

a) I am very active and involved in my community.

1	2	3	4	5	6	7
strongly disagree	disagree	slightly disagree	neutral	slightly agree	agree	Strongly agree

b) Dr. Martin Luther King Jr.’s Birthday should be a national holiday.

1	2	3	4	5	6	7
strongly disagree	disagree	slightly disagree	neutral	slightly agree	agree	strongly agree

Juror Name: _____
 Juror Number: _____

c) I favor school integration.

1	2	3	4	5	6	7
strongly disagree	disagree	slightly disagree	neutral	slightly agree	agree	strongly agree

d) The police are thorough and accurate in their investigations.

1	2	3	4	5	6	7
strongly disagree	disagree	slightly disagree	neutral	slightly agree	agree	strongly agree

f) The police treat black men worse than white men.

1	2	3	4	5	6	7
strongly disagree	disagree	slightly disagree	neutral	slightly agree	agree	strongly agree

g) Racial discrimination is no longer a problem in the United States.

1	2	3	4	5	6	7
strongly disagree	disagree	slightly disagree	neutral	slightly agree	agree	strongly agree

h) Racial discrimination is no longer a problem in Mississippi.

1	2	3	4	5	6	7
strongly disagree	disagree	slightly disagree	neutral	slightly agree	agree	strongly agree

Juror Name: _____
 Juror Number: _____

i) I believe that “reverse discrimination” toward whites is more common today than discrimination against racial minorities.

1	2	3	4	5	6	7
strongly disagree	disagree	slightly disagree	neutral	slightly agree	agree	strongly agree

j) I support affirmative action programs for hiring more racial minorities.

1	2	3	4	5	6	7
strongly disagree	disagree	slightly disagree	neutral	slightly agree	agree	strongly agree

k) I consider myself a deeply religious person.

1	2	3	4	5	6	7
strongly disagree	disagree	slightly disagree	neutral	slightly agree	agree	strongly agree

e) It is unfair to prosecute a person as an adult who was under the age of 18 at the time he/she committed a crime.

1	2	3	4	5	6	7
strongly disagree	disagree	slightly disagree	neutral	slightly agree	agree	strongly agree

f) When a person says something to me, things like seeing their facial expressions, hearing their voice, and knowing the background of the statement helps me understand what they mean.

1	2	3	4	5	6	7
Strongly Disagree	disagree	slightly disagree	neutral	slightly agree	agree	strongly agree

In your opinion, what is the primary cause of racial tension and conflict? _____

Juror Name: _____
Juror Number: _____

50. Have you, your spouse, any close relatives any close friends ever had a serious negative experience with a person of another race? YES ____ NO ____

If yes, please explain:

51. Have you, your spouse, any close relatives or any close friends ever been a victim of racial discrimination? YES ____ NO ____

If yes, please explain:

52. Have you, your spouse, any close relatives any close friends ever been accused of racial discrimination? YES ____ NO ____

If yes, please explain:

53. In general, do you think our society treats people of all races equally? YES ____ NO ____

Please explain:

54. Do you have any close friends, relatives or coworkers who are of a different race than your own? YES ____ NO ____

55. Do you have any neighbors who are of a different race than your own? YES ____ NO ____

If so, how do you feel about having neighbors of a different race? If not, how would you feel about having neighbors of a different race?

56. Is there any racial or ethnic group that you do not feel comfortable being around?

Juror Name: _____
Juror Number: _____

YES ____ NO ____

If yes, please explain:

57. Which of the following best describes your current neighborhood?

1. All White residents
2. Mostly White residents
3. Mostly Black residents
4. All Black residents
5. Mixed race neighborhood
6. Other

58. Do you know any couples in which the people are of different races?

YES ____ NO ____

If so, what is their relationship with you, and how do you feel about their interracial relationship? If not, how would you feel about an acquaintance or family member being involved in an interracial relationship?

Relationship: _____

I approve ____ It makes me uncomfortable ____ I don't like it, but accept it ____ I oppose it ____

Please explain:

59. Do you believe that a person must be "racist" to commit a racially motivated crime?

YES ____ NO ____

Please explain:

60. Do you believe that a person can commit a racially motivated crime against an African American if that person has African American friends or acquaintances?

YES ____ NO ____

Juror Name: _____
 Juror Number: _____

Please explain:

61. Have you, your spouse, any close relative or any close friend ever been a member of or made a contribution to any of the following groups?

	Membership	Contribution		
American Civil Liberties Union (ACLU)	. Yes	. No	. Yes	. No
Americans for Preservation of the White Race (APWR)	. Yes	. No	. Yes	. No
Any Militia or Patriot group	. Yes	. No	. Yes	. No
Any peace officers association (including FOP)	. Yes	. No	. Yes	. No
Any political party (party _____)	. Yes	. No	. Yes	. No
Anti Defamation League	. Yes	. No	. Yes	. No
Army of God, or World Church of the Creator	. Yes	. No	. Yes	. No
Aryan Nations, or National Alliance	. Yes	. No	. Yes	. No
Black Muslims	. Yes	. No	. Yes	. No
Black Panthers	. Yes	. No	. Yes	. No
Christian Identity Movement	. Yes	. No	. Yes	. No
Citizens Coalition	. Yes	. No	. Yes	. No
Congress of Racial Equality (CORE)	. Yes	. No	. Yes	. No
Council of Conservative Citizens	. Yes	. No	. Yes	. No
Dixiecrat Party	. Yes	. No	. Yes	. No
Eagle Forum	. Yes	. No	. Yes	. No
Freemasons, or Order of the Eastern Star	. Yes	. No	. Yes	. No
The Heritage Foundation	. Yes	. No	. Yes	. No
John Birch Society	. Yes	. No	. Yes	. No
White Knights of the Ku Klux Klan (KKK)				
or Women's Auxiliary of the KKK	. Yes	. No	. Yes	. No
League of the South	. Yes	. No	. Yes	. No
Mothers Against Drunk Driving (MADD)	. Yes	. No	. Yes	. No
Nation of Islam	. Yes	. No	. Yes	. No
National Alliance	. Yes	. No	. Yes	. No
National Association for the Advancement of Colored People (NAACP)	. Yes	. No	. Yes	. No

Juror Name: _____
 Juror Number: _____

National Organization of Women (NOW)	. Yes	. No	. Yes	. No
National Rifle Association (NRA)	. Yes	. No	. Yes	. No
National States Rights Party	. Yes	. No	. Yes	. No
New South Coalition	. Yes	. No	. Yes	. No
Posse Comitatus	. Yes	. No	. Yes	. No
Southern Christian Leadership Conference (SCLC)	. Yes	. No	. Yes	. No
Student Nonviolent Coordinating Committee (SNCC)	. Yes	. No	. Yes	. No
United Americans for Conservative Government	. Yes	. No	. Yes	. No
United Negro College Fund	. Yes	. No	. Yes	. No
White Citizens Council	. Yes	. No	. Yes	. No
World Church of the Creator	. Yes	. No	. Yes	. No

62. Do you believe that younger people should be held less accountable for their actions than older people?

YES ____ NO ____

If yes, please explain:

63. Do you believe that young women should be held less accountable for their actions than young men?

YES ____ NO ____

If yes, please explain:

64. Do you believe leaders and followers in a group should be held equally accountable for the actions of the group?

YES ____ NO ____

If no, please explain:

Juror Name: _____
Juror Number: _____

65. This case involves allegations that the defendants participated in a conspiracy. It is a principal of law that a conspirator is responsible for the offenses committed by other conspirators if the conspirator was a member of the conspiracy when the offense was committed and the offense was committed in furtherance of, or as a foreseeable consequence of, the conspiracy.

(a) Do you agree with this principal of law?

YES NO

If no, please explain:

66. This case involves allegations that two of the defendants participated in a crime called solicitation. Under federal law, it is a crime for anyone to solicit, command, induce, or otherwise endeavor to persuade another person to engage in conduct constituting a felony that has as an element the use, attempted use, or threatened use of physical force against another when done with intent that another person engage in that conduct and under circumstances strongly corroborative of that intent.

(a) Do you agree with this principal of law?

YES NO

If no, please explain:

67. Have you or anyone in your family ever owned a gun?

YES NO

If yes, please state whether the gun was owned by you or some other family member, where it was stored, the type of gun and the purpose for which it was kept.

Juror Name: _____
Juror Number: _____

68. Would you be inclined to give more or less weight to the testimony of a law enforcement officer over another witness for the mere fact that he/she is a law enforcement officer?

more weight less weight equal weight

Please explain:

69. Would you be inclined to give more or less weight to the testimony of a religious leader over another witness for the mere fact that he/she is a religious leader?

more weight less weight equal weight

Please explain:

70. Would you be inclined to give more or less weight to the testimony of a person convicted of a crime over another witness for the mere fact that he/she has been convicted of a crime?

more weight less weight equal weight

Please explain:

71. Do you believe that if a person has lied about one thing he/she cannot be believed about anything else regardless of the reason for the lie?

YES _____ NO _____

Juror Name: _____
Juror Number: _____

72. Do you believe that if two people see the same event and remember it differently that one of them must be less than truthful?

YES _____ NO _____

73. Do you drink alcoholic beverages:

Regularly (i.e., at least once a week)
 Intermittently (i.e. at least once a month)
 Rarely (i.e., once a year)
 Never

74. This case may involve testimony from witnesses who were under the influence of alcohol and/or drugs at the time certain events occurred. Would that fact alone cause you to disregard some or all of that witness's testimony?

YES _____ NO _____

75. Do you believe that a person who is under the influence of alcohol at the time certain events occurred is more or less responsible for his/her actions?

more responsible less responsible equally as responsible

76. Do you believe that the federal government plays too big a role in our society?

YES _____ NO _____

77. How important is it to you that the federal government prosecutes people who commit racially based crimes?

Very Important Moderately Important Not Important

Please explain: _____

78. Do you believe that a person who has entered into a plea agreement with the government and who has agreed to testify is:

more likely to tell the truth less likely to tell the truth equally likely to tell the truth

Please explain: _____

Juror Name: _____
Juror Number: _____

79. Sometimes witnesses give information to a police officer or Government agent in return for a promise that they will get a lower sentence. Does that automatically make that witness's testimony more or less believable?

More Less No opinion Don't know

80. Do you know any reason that would keep you from serving fairly and impartially as a juror in a case in which the defendant was a person whose race was different than yours?

YES _____ NO _____

If yes, please explain:

81. Do you know any reason that would keep you from serving fairly and impartially as a juror in a case in which the victim was a person whose race was different than yours?

YES _____ NO _____

If yes, please explain:

82. Do you generally 'hold your ground', when you feel that you are correct, or are you easily swayed by the strong influence of others?

Generally hold my ground. YES NO

Generally swayed by others. YES NO

Almost always swayed by others. YES NO

83. Which of the following would you use to describe yourself? Please check all that apply:

- Aggressive
- Analytical
- Careful
- Emotional
- Free spirit
- Hard-nosed
- Impulsive
- Independent
- Judgmental
- Law & order
- Logical
- Naive
- Non-conformist
- Obsessive
- Old-fashioned
- Opinionated
- Outspoken
- Pessimistic
- Private
- Pro-government
- Religious
- Selfish
- Shy
- Sensitive
- Skeptical
- Strict
- Technical
- Thoughtful
- visual
- Other

Juror Name: _____
Juror Number: _____

84. Under the law, the facts at issue in the trial are for the jury to determine. The law applicable to the charges in the case is something on which the court will instruct you. You are required to accept the law as the judge explains it to you regardless of any opinions you might have as to what the law is or should be. Would you have any difficulty following that instruction?

YES _____ NO _____

85. Please check the answer that most closely reflects your own opinion concerning the following statements:

(a) Do you believe that "proof beyond a reasonable doubt" is too heavy a burden for the prosecution to have to meet in a criminal trial?

YES _____ NO _____ UNSURE _____

(b) Do you feel that the criminal justice system generally treats criminals too harshly, about right or too leniently?

TOO HARSH _____ ABOUT RIGHT _____ TOO LENIENT _____

86. Some witnesses in this case may be law enforcement officers and government officials. The credibility of these witnesses is to be judged by the same standards as any other witness. Their testimony is not entitled to any greater or lesser weight simply because they are involved in law enforcement. Would you have any difficulty following this rule?

YES _____ NO _____

87. Under the law, a defendant need not testify or produce any evidence. The burden of proof is always on the government. If a defendant does not testify, the jury may not consider that fact in any way in reaching a decision. Would you have any difficulty following this rule?

YES _____ NO _____

88. Every defendant is presumed innocent and cannot be convicted unless the jury, unanimously and based solely on the evidence in the case, or the lack thereof, decides that his guilt has been proved beyond a reasonable doubt. Would you have any difficulty following this rule?

YES _____ NO _____

Juror Name: _____
Juror Number: _____

89. The jurors in this case will be required to take an oath that they will decide the facts in this case according to the evidence and the law as the judge gives it to you, and that they will do so without fear or favor to any person. Is there anything about this case that may prevent you from following that oath?

YES _____ NO _____

90. Is there anything about the subject matter of this case, or the points covered in this questionnaire, which creates a question in your mind as to whether you could be a fair, objective and impartial juror in this particular case?

Please explain:

91. Is there anything else that you think the Court should know that might influence your ability to fairly and impartially judge the evidence in this case and to apply the law as instructed by the Court?

YES _____ NO _____ NOT SURE _____

If yes, Please explain:

Juror Name: _____
Juror Number: _____

CONTINUATION OF ANSWER(S)

(Please remember to include the number of the question(s) you are completing.)

Juror Name: _____

Juror Number: _____

Juror Name: _____
Juror Number: _____